

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

2015 OCT -7 PM 3:32

UNITED STATES OF AMERICA

v.

DIHEIM YOUNG,
Defendant.

CLERK
BY PC
DEPUTY CLERK

Criminal No. 2:15-cr-35

SECOND SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges:

From in or about December 2013 to in or about March 2015, in the District of Vermont, and elsewhere, defendant DIHEIM YOUNG knowingly and willfully conspired with others known and unknown to the grand jury, to distribute a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(C))

COUNT TWO

The Grand Jury further charges:

On or about December 9, 2013, in the District of Vermont, defendant DIHEIM YOUNG, knowingly and intentionally distributed a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, and a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

COUNT THREE

The Grand Jury further charges:

On or about March 15, 2015, in the District of Vermont and elsewhere, defendant DIHEIM YOUNG, knowingly and intentionally possessed with intent to distribute a mixture or substance containing a detectable amount of cocaine base, a Schedule II controlled substance.

(21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

COUNT FOUR

The Grand Jury further charges:

In or about August 2014, in the District of Vermont and elsewhere, defendant DIHEIM YOUNG did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means J.K., knowing that force, fraud, and coercion would be used to cause J.K. to engage in commercial sex acts.

(18 U.S.C. §§ 1591(a) and (b)(1))

COUNT FIVE

The Grand Jury further charges:

In or about August 2014, in the District of Vermont and elsewhere, defendant DIHEIM YOUNG knowingly transported J.K. in interstate commerce from Rutland, Vermont to New York, New York, with the intent that J.K. engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

(18 U.S.C. § 2421)

COUNT SIX

The Grand Jury further charges:

In or about September 2014, in the District of Vermont and elsewhere, defendant DIHEIM YOUNG did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means B.A., knowing that force, fraud, and coercion would be used to cause B.A. to engage in commercial sex acts.

(18 U.S.C. §§ 1591(a) and (b)(1))

COUNT SEVEN

The Grand Jury further charges:

In or about September 2014, in the District of Vermont and elsewhere, defendant DIHEIM YOUNG knowingly persuaded, induced, enticed, and coerced B.A. to travel from Rutland, Vermont to New York, New York, with the intent that B.A. engage in prostitution and in sexual activity for which a person can be charged with a criminal offense.

(18 U.S.C. § 2422)

A TRUE BILL



Heath E. Ross (by HER)
ERIC S. MILLER
United States Attorney
Rutland, Vermont
October 7, 2015